

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

RALPH “TREY” JOHNSON, *et al.*,
individually and on behalf of all persons
similarly situated,

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION, a/k/a the NCAA, *et al.*,
Defendants.

Civil Action No. 2:19-cv-05230-JP

**STIPULATION AND
[PROPOSED] ORDER**

WHEREAS, Plaintiffs filed their Motion to Amend on September 2, 2021
(ECF 57-59);

WHEREAS, on September 9, 2021, the Court conducted a telephonic
conference with the parties concerning the deadline to oppose said Motion;

IT IS HEREBY STIPULATED AND AGREED, by and between the
undersigned attorneys for the parties, as follows:

1. Defendants do not oppose the Motion to Amend.
2. The parties agree that the proposed Second Amended Complaint (ECF 59-1) that is the subject of the Motion to Amend has no effect on the issues in the pending Motion to Dismiss filed by the NCAA and Non-Attended School defendants (ECF 26), and that the Court should proceed to rule on the latter.
3. No response to the proposed Second Amended Complaint need be filed before the 60th day following entry of the ruling on the pending Motion to Dismiss filed by the NCAA and Non-Attended School defendants.

4. If, on the date for a response to the Second Amended Complaint under Paragraph 3, there are pending any motions, petitions and/or proceedings related to interlocutory appeal of the Court's rulings either on the Motion to Dismiss of the Attended Schools (ECF 55-56), or the pending Motion to Dismiss filed by the NCAA and Non-Attended School defendants, no response to the proposed Second Amended Complaint need be filed until further order of the Court.

Dated: September 9, 2021

s/ Steven B. Katz.

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Counsel for Defendants.

Dated: September 9, 2021

s/ Michael J. Willemin.

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Counsel for Plaintiffs.

**PURSUANT TO STIPULATION,
IT IS SO ORDERED.**

DATED:

HON. JOHN R. PADOVA
UNITED STATES DISTRICT
JUDGE